

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2006 NOV -7 P 1:38



KUHN, HEAP & MONSON
ATTORNEYS AT LAW

RICHARD W KUHN dk@kuhnheap.com

ROBERT A HEAP bheap1@quixnet.net

LEONARD M MONSON len@kuhnheap.com

JENNIFER BRAHLER NAGLE jb@kuhnheap.com

SCOTT A KENT kent_kuhnheap@yahoo.com

WWW.KUHNHEAP.COM

NAPER OFFICE PLAZA

552 SOUTH WASHINGTON STREET

SUITE 104

NAPERVILLE, ILLINOIS 60540

Please respond to above Address

November 6, 2006

TELEPHONE (630) 369-4980

TELEFAX (630) 357-1922

CHICAGO OFFICE

100 WEST MONROE, SUITE 1403

CHICAGO, ILLINOIS 60603

OF COUNSEL

JOSEPH F PHELAN

Lawrence H. Norton
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

MUR 5873

RE: Addendum to Complaint filed October 30, 2006, regarding Joseph Shannon, Candidate, 13th CD, Illinois, Joseph Shannon for Congress Committee, and Joseph A. Gyamarthy, Treasurer,

Dear Mr. Norton:

I am writing to bring to your attention additional information that has come to my attention since October 30, 2006, when I filed the above-referenced complaint regarding the Joseph Shannon for Congress Committee.

Failure to Report PAC Contributions

ATLA

1. On or about September 22, 2006, the Association of Trial Lawyers of America PAC, (ATLA), (C00024521) reported a contribution in the amount of Two Thousand Five Hundred Dollars (\$2,500) to the Joseph Shannon for Congress Committee. Attached is Exhibit W, incorporated by reference herein.
2. On information and belief, this contribution should have been reported on the October 15, 2006 quarterly report by the Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyamarthy, Treasurer, pursuant to 11 CFR 104.3.
3. On information and belief, the FEC Form 3 filed by Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyamarthy, Treasurer, failed to disclose the receipt of the contribution from ATLA

on the report filed on October 15, 2006, which required the reporting of all contributions received between July 1, 2006 and September 30, 2006. (Exhibit H was previously submitted.)

4. On information and belief, as of November 5, 2006, no disclosure of this contribution has been reported, in violation of 11 CFR 104.

National Committee for an Effective Congress

5. On or about September 18, 2006, the National Committee for an Effective Congress (Effective) (C00003558) made two (2) contributions in the amounts of Five Hundred Dollars (\$500) and Two Thousand Five Hundred Dollars (\$2500) to the Joseph Shannon for Congress Committee. Attached is Exhibit X, incorporated by reference herein.
6. On information and belief, these contributions should have been reported on the October 15, 2006 quarterly report by the Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyarmathy, Treasurer, pursuant to 11 CFR 104.3.
7. On information and belief, the FEC Form 3 filed by Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyarmathy, Treasurer, failed to disclose the receipt of the contribution from Effective on the report filed on October 15, 2006, which required the reporting of all contributions received between July 1, 2006 and September 30, 2006. (Exhibit H was previously submitted.)
8. On information and belief, as of November 5, 2006, no disclosure of this contribution has been reported, in violation of 11 CFR 104.

Bricklayers

9. On or about September 28, 2006, the International Union of Bricklayers & Allied Craftworkers PAC (Bricklayers) (C00003632) reported a contribution in the amount of Three Thousand Five Hundred Dollars (\$3,500) to the Joseph Shannon for Congress Committee. Attached is Exhibit Y, incorporated by reference herein.
10. On information and belief, this contribution should have been reported on the October 15, 2006 quarterly disclosure report by the Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyarmathy, Treasurer, pursuant to 11 CFR 104.3.
11. On information and belief, the FEC Form 3 filed by Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyarmathy, Treasurer, failed to disclose the receipt of the contribution from Bricklayers on the report filed on October 15, 2006, which required the reporting of all contributions received between July 1, 2006 and September 30, 2006. (Exhibit H was previously submitted.)
12. On information and belief, as of November 5, 2006, no disclosure of this contribution has been reported, in violation of 11 CFR 104.3.

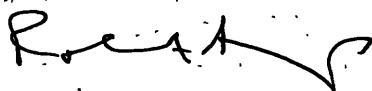
Failure to Include Proper Disclaimers

27190273144

13. FEC rules require that any communication, including more than 500 substantially similar phone calls within 30 days, made by a political committee must include a disclaimer, and that if the campaign authorizes and finances a communication, the disclaimer must state that the communication was paid for by the authorized committee.
14. On information and belief, Exhibit Z, the telephonic, pre-recorded "robocalls" made to thousands of households in the 13th Congressional District on Saturday, November 4, 2006, by a supporter of Joseph Shannon did not include any disclaimer, in violation of 110.11.
15. On information and belief, Joseph Shannon for Congress Committee, Joseph Shannon, and Joseph A. Gyarmathy, have failed to comply with the FEC rules which require a disclaimer on public communications.

Again, thank you for adding this information to the Complaint filed with your agency on October 30, 2006. Please investigate these allegations at the earliest possible time.

Sincerely,



Robert A. Heap

Enclosures

Signed and sworn before me this 6 day of November, 2006.

